

GIBSON, DUNN & CRUTCHER LLP
RACHEL S. BRASS, SBN 219301
RBrass@gibsondunn.com
AUSTIN V. SCHWING, SBN 211696
ASchwing@gibsondunn.com
555 Mission Street, Suite 3000
San Francisco, California 94105-2933
Telephone: 415.393.8200
Facsimile: 415.393.8306

Attorneys for Defendants
CHUNGHWA PICTURE TUBES, LTD. and
CHUNGHWA PICTURE TUBES (MALAYSIA)
SDN. BHD., and TATUNG COMPANY OF
AMERICA, INC.

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

This Document Relates to:

All Actions;

Master File No. 4:07-CV-05944-JST
MDL No. 1917

**DECLARATION OF RACHEL S. BRASS
IN SUPPORT OF MOTION TO
WITHDRAW AS COUNSEL FOR
DEFENDANTS CHUNGHWA PICTURE
TUBES, LTD., CHUNGHWA PICTURE
TUBES (MALAYSIA) SDN. BHD., and
TATUNG COMPANY OF AMERICA, INC.**

1 I, Rachel S. Brass, declare as follows:

2 1. I am a partner at the law firm of Gibson, Dunn & Crutcher LLP, counsel of record for
3 Defendants in the above-captioned action. I offer this declaration in support of Gibson, Dunn &
4 Crutcher's ("Gibson Dunn") Motion to Withdraw As Counsel of Record. I have personal knowledge
5 of the facts set forth in this declaration (unless otherwise noted), and, if called to testify, I could and
6 would competently testify to them.

7 2. Attached hereto as **Exhibit A** is a true and correct copy of a filing dated November 15,
8 2019, in Case No. 3:19-cv-01246 in the United State District Court For The District of Puerto Rico
9 entitled "Notice of Filing of Petition For Relief Under Chapter 11 of The United States Code, 11
10 U.S.C. § 101, Et. Seq., And Imposition of Automatic Stay."

11 3. Attached hereto as **Exhibit B** is a true and correct copy of an article published on
12 September 20, 2019 by Taipei Times, entitled "Court seizes CPT assets after firm files for insolvency,"
13 which can be found at <https://www.taipeitimes.com/News/biz/archives/2019/09/20/2003722583>.

14 4. Attached hereto as **Exhibit C** is a true and correct copy of an article published on
15 November 21, 2019, by Thomas Reuters Westlaw NewsRoom in collaboration with China Post,
16 entitled to "Government to fund back pay for employees of bankrupt CPT."

17 5. I have received no response from email or mail correspondence sent to any employee,
18 officer, or director of Chunghwa Picture Tubes, Ltd. or Chunghwa Picture Tubes (Malaysia) Sdn.
19 Bhd. since September 2019. That includes in response to outstanding requests with respect to filings
20 in active legal matters. Accordingly, on September 4, 2019, I sent a letter to President of CPT S.C.
21 Lin, cc'ing my contacts on CPT's legal team, reporting on CPT's legal team's lack of response to
22 any of my correspondence, and in light of news reports regarding CPT's bankruptcy proceeding. I
23 received no response to my September 4, 2019 letter. Likewise, I have received no substantive
24 response to any correspondence in over a year; rather, I received "bounce back" responses to
25 electronic mail correspondence.

26 6. The last correspondence I received from any employee of Tatung Company of
27 America, Inc. was a notification after the company sought bankruptcy protections. All subsequent
28 correspondence went unanswered.

1 7. On August 31, 2020, I notified all parties in Case No. 3:19-cv-01246 in the United
2 State District Court For The District of Puerto Rico that Gibson Dunn intends to withdraw as counsel
3 for Chunghwa Picture Tubes, Ltd., Chunghwa Picture Tubes (Malaysia) Snd. Bhd., and Tatung
4 Company of America, Inc.

5 I declare under penalty of perjury under the laws of the United States of America and the
6 State of California that the foregoing is true and correct. Executed at Healdsburg, California, on the
7 3rd of September, 2020.

8
9 Dated: September 3, 2020

10
11
12 GIBSON, DUNN & CRUTCHER LLP

13
14 By: /s/ Rachel S. Brass
15 Rachel S. Brass (SBN 219301)
16 Austin Schwing (SBN 211696)
17 GIBSON, DUNN & CRUTCHER LLP
18 555 Mission Street, Suite 3000
19 San Francisco, CA 94105
20 (415) 393.8200 (Phone)
21 (415) 393.8306 (Facsimile)
22 *Attorneys for Defendants*
23 CHUNGHWA PICTURE TUBES, LTD.,
24 CHUNGHWA PICTURE TUBES
25 (MALAYSIA) SDN. BHD., and TATUNG
26 COMPANY OF AMERICA, INC.
27
28